

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING & DEVELOPMENT,

Plaintiff,

V.

GOOGLE, LLC,

Defendant

Case No. 6:20-cv-00572-ADA

## JURY TRIAL DEMANDED

**DECLARATION OF MOSES XIE ON BEHALF OF PLAINTIFF BRAZOS LICENSING  
& DEVELOPMENT IN SUPPORT OF PLAINTIFF'S  
DAUBERT MOTION TO EXCLUDE THE OPINIONS OF DR. HENRY HOUH**

I, Moses Xie, declare as follows:

1. I am an attorney duly admitted to practice before this Court.
2. I am a principal of Folio Law Group PLLC, counsel of record for Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing & Development (“Brazos”).
3. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.
4. I make this declaration in support of Plaintiff Brazos Licensing & Development’s *Daubert* Motion to Exclude Opinions of Dr. Henry Houh.
5. Attached, as Exhibit A, is a true and correct copy of excerpts of the April 28, 2023 *Rebuttal Expert Report of Dr. Henry H. Houh Regarding Non-Infringement of U.S. Patent No. 8,041,806*.
6. Attached, as Exhibit B, is a true and correct copy of excerpts of the February 16, 2023 Markman hearing transcript in this matter.
7. Attached, as Exhibit C, is a true and correct copy of excerpts of the May 25, 2023 Deposition Transcript of Dr. Henry Houh.
8. Attached, as Exhibit D, is a true and correct copy of excerpts of the March 30, 2023 *Opening Expert Report of Dr. Henry H. Houh Regarding U.S. Patent No. 8,041,806*.
9. Attached, as Exhibit E, is a true and correct copy of excerpts of the May 10, 2023 Deposition Transcript of Dr. Henry Houh.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Seattle, WA, on June 28, 2023.

By: /s/ Moses Xie  
Moses Xie